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February 8, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary - Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

RE: CC Docket Nos. 96-45[✓] and 97-160
FCC CCB Cost Model Input Workshops

Dear Ms. Salas,

This letter transmits U S WEST comments to the Common Carrier Bureau staff on one of the topics which was covered during the December cost model input workshops, and follow-up meetings held with various parties from the industry. The issue on which U S WEST specifically provides comments is in rebuttal to comments made by John Donovan concerning the appropriate computation of Indoor Building terminal expenses.

We request that this information be made a part of the record in this matter. The original and three copies of this notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(b)(1) for this purpose. If there are any questions, please call.

Sincerely,



Kenneth Cartmell

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The purpose of this paper is to respond to the indoor building terminal demonstration that AT&T performed for the FCC staff in Washington D C on January 20, 1999. There are two areas concerning this demonstration that U S WEST addresses. The first is the splicing time that AT&T presented and the second is AT&T's engineering assumptions for the indoor building terminal.

AT&T stated that the average time for splicing is 300 pairs per hour for an indoor building terminal. This may be true in a perfect situation with ideal conditions, such as a classroom. However, in the real world, which presents a wide variety of situations, this is not always the case. U S WEST does not believe that this is an average number of pairs that can be joined on a consistent basis. Based on an internal U S WEST time and motion study, U S WEST believes that 150 pairs per hour reflects a proper average for the number of pairs joined for an indoor building terminal. This is a more realistic view of the actual time to splice pairs under average conditions. Also listed in the time and motion study are the times for setup and the other activities needed to complete the entire work operation required to build an indoor building terminal. This data can be found in Attachment 1.

Regarding the engineering assumptions of the AT&T demonstration, U S WEST now addresses some areas of concern with AT&T's design of an indoor building terminal of 7200 pairs. As AT&T pointed out in their demonstration, there are many different ways to engineer an indoor building terminal. AT&T's assumptions were just one way and U S WEST believes that AT&T neglected some major points of consideration.

In comparing the design utilized by Sprint in its demonstration and the AT&T design, U S WEST agrees with AT&T that a Tip Cable is usually not required. Instead, at the Lightning Protector, US WEST would use a Protector that has a cable stub at both ends so that an extra punch down block would not be required, as shown in the Sprint example. (Please see Attachment 2.)

On the building terminal block, AT&T uses a single 66M150 block and bridge clips to make a cross-connect. The Sprint example uses two 66M150 blocks and uses cross connection jumpers. U S WEST uses the same design as the Sprint example for the following reasons.

1. This design creates a clear and concise demarcation point.
2. The purpose of an indoor building terminal is to provide a flexibility point between the feeder network and the distribution network. AT&T's design does not provide for this flexibility. By using bridge clips, AT&T requires a 1 to 1 design between the feeder and distribution network with no flexibility.
3. A feeder network is designed, based on forecasted demand. By establishing an indoor building terminal, a telephone company can provide the flexibility needed by designing the feeder based on forecasted demand. In contrast, the manner AT&T designed their indoor building terminal did

not provide for this flexibility. The AT&T design calls for the feeder network to be designed to ultimate demand and U S WEST does not know of any operating telephone company that has the luxury to design their feeder for the ultimate demand.

AT&Ts design of an indoor building terminal is clearly not the most beneficial method for achieving an efficient feeder network. In contrast, Sprint's example provides the necessary flexibility in the design of an appropriate feeder network.

The pricing that AT&T has used for their equipment does not assume any loading factors that are utilized to recover other costs associated with placing an indoor building terminal (e.g. exempt material, labor to place, shipping). AT&T has designed their indoor building terminal for initial least cost and not on the best engineering practices which are necessary for operational efficiency.

Copper Building Terminal

	Function	Hours
1	Closure/Splice Case	2 hours
2	Conn Blk Placed	.25 hours
3	Pairs Identified	100 Pairs per hour
4	Pairs Joined	150 Pairs per hour
5	Pairs Removed	600 Pairs per hour
6	Pairs Terminated	100 Pairs per hour
7	Pairs Transferred	10 Pairs per hour
8	Pressure Plug	1.5 hours
9	Stub Placed	1 hour
10	Terminal Placed	.5 hours
11	Terminal Removed	.1 hour

1800 Pair X-Connect w/ R366 900 Pair Building Terminal Graphic Representation

